



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
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BOSTON, MASSACHUSETTS 02108

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

(617) 727-2200
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April 3, 2023

Shonda D. Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118-6500

Re: *Petition of the State 911 Department for Approval of Fiscal Year ("FY") 2023
Expenditures, FY 2024 Development Grant Amount, Telecommunicator Emergency
Response Taskforce ("TERT") Grant Guidelines, Massachusetts Equipment Distribution
Program (MassEDP) Request for Response (RFR)., D.T.C. 23-2*

Dear Secretary Green:

Enclosed please find the Attorney General's Notice of Intervention, Appearance of Counsel, and Certificate of Service. Please file according to your usual practice. Thank you for your assistance in this matter.

Sincerely,

/s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General

Enclosures

cc: William Bendetson, Presiding Officer
Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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PETITION OF THE STATE 911)	
DEPARTMENT FOR APPROVAL OF)	D.T.C. 23-2
FISCAL YEAR ("FY") 2023)	
EXPENDITURES, FY 2024)	
DEVELOPMENT GRANT AMOUNT,)	
TELECOMMUNICATOR)	
EMERGENCY RESPONSE)	
TASKFORCE ("TERT") GRANT)	
GUIDELINES, MASSACHUSETTS)	
EQUIPMENT DISTRIBUTION)	
PROGRAM (MASSEDP) REQUEST)	
FOR RESPONSE (RFR))	
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ATTORNEY GENERAL'S NOTICE OF INTERVENTION

Andrea Joy Campbell, as she is the Attorney General of the Commonwealth of Massachusetts, hereby gives notice of intervention as of right in the above-captioned matter under the authority specifically granted her by G.L. c. 12, §§10 and 11E and under her common law authority to represent and protect the public interest.

The Attorney General, as the chief law enforcement officer of the Commonwealth, has "broad common law and statutory powers to represent the public interest." *Commonwealth v. Mass CRINC*, 392 Mass. 79, 88 (1984); *see Sec'y of Admin. & Fin. v. Attorney General*, 367 Mass. 154, 159 (1975) (quoting *Commonwealth v. Kozlowsky*, 238 Mass. 379, 389 (1921)). "[T]he Attorney General has a general statutory mandate, in addition to any specific statutory mandate, to protect the public interest." *Mass CRINC*, 392 Mass. at 88 (citing G.L. c. 12, § 10); *see also Lowell Gas Co. v. Attorney General*, 377 Mass. 37, 48 (1979) (holding that the Attorney General has a "common law duty to represent the public interest and to enforce public rights"). The Attorney General's authority to protect the public interest applies to this administrative

proceeding, as the Legislature did not intend “to vary the power and duty of the Attorney General to control the conduct of litigation involving the interests of the Commonwealth depending on the forum in which he appears.” *Feeney v. Commonwealth*, 373 Mass. 359, 367 (1998). The Attorney General’s Office’s interpretation of its own authority should be given the same significant deference of any administrative agency in carrying out a power granted by the legislature. *Dowling v. Registrar of Motor Vehicles*, 425 Mass. 523, 525 (1997) (quoting *Mass. Med. Soc. v. Comm’r of Ins.*, 402 Mass. 44, 62 (1988)).

Respectfully submitted,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200

Dated: April 3, 2023

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DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**PETITION OF THE STATE 911
DEPARTMENT FOR APPROVAL OF
FISCAL YEAR (“FY”) 2023
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DEVELOPMENT GRANT AMOUNT,
TELECOMMUNICATOR
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TASKFORCE (“TERT”) GRANT
GUIDELINES, MASSACHUSETTS
EQUIPMENT DISTRIBUTION
PROGRAM (MASSEDP) REQUEST
FOR RESPONSE (RFR)**

D.T.C. 23-2

APPEARANCE OF COUNSEL

Please enter my appearance on behalf of Andrea Joy Campbell, the Attorney General of
the Commonwealth of Massachusetts, in the above captioned proceeding.

Respectfully submitted,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
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D.T.C. 23-2

I hereby certify that I have this day served the foregoing documents upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of 207 C.M.R. 1.05(1). Dated at Boston this 3rd day of April, 2023.

/s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200